

11 January, 2000

Mr. Louis Vinagro Jr.
New England Ecological Corporation, Inc. (NEED)
23 Green Hill Road
Johnston, RI 02919

Re: Recent Facility Compliance Issues

Dear Mr. Vinagro:

This correspondence is to follow up on the recent on-site inspections conducted by RIDEM personnel at the NEED Facility on 6 October, 9 November and 23 December 1999.

As you are aware, from being a member, the citizens' action committee that was recently formed was brought together to address odor and other numerous issues in areas of Johnston and western Cranston near the Central Landfill. As part of the Department's involvement in that process, the Office of Waste Management (OWM) has begun to follow up in writing (thereby creating a public record document) on the field inspection reports which are routinely provided to the facility at the time of inspection.

The purpose of these summary letters is to make the management at the facility fully aware of the results of the inspection(s), so that corrective measures can be implemented in the field as promptly as possible. This notification, therefore, is not sent in lieu of any potential formal enforcement action(s), but is meant as an additional notice so that you may address the concerns raised by the public relative to compliance at your facility. The Department's Office of Compliance and Inspection reserves its rights to issue possible future enforcement actions based upon the results of these or other inspections.

The issues documented by field staff during the on-site inspections dated above were as follows:

- 1) During the 23 December 1999 inspection, rotten egg type odor was detected on-site at the northeast side of cell #1. Also, burning type odor was detected on the north side of Cell #2. The wind was blowing from the southwest direction during this inspection. Also, during the 9 November 1999 inspection, strong hydrogen sulfide type odors were noted at the east and northeast side of cell #1 as well as burning type odor on the northeast side of cell #2. These odors were observed on-site, however, on the following dates 2,12,17,18,20 and 28 December 1999, and 7 January 2000, RIDEM personnel did find objectionable odors emanating off-site from NEED.
- 2) Heavy smoke/steam was observed emanating from Cell #2 during excavation activities. Also, no daily cover was observed being utilized at that cell.
- 3) Heavy smoke/steam was observed emanating from stockpiles of excavated material placed on the ground adjacent to the Wood Recovery Facility. Said material is required to be fed directly from the transporter into the Wood Recovery Facility.

- 4) Construction and demolition debris (C&D) waste was left uncovered at the northern portion of cell #1. The southern portion of the cell was observed covered with screenings and wood chips (cell #1 is currently being filled). Adequate daily cover must be utilized.
- 5) A substandard berm (4-6 feet high) was observed constructed on the perimeter of Cell #1 without any engineering controls and without RIDEM approval. The berm was constructed with C&D screenings versus gravel to create an unauthorized increase in the overall capacity of the Cell.
- 6) Excavation activities were observed in cell #2 to be occurring in close proximity to the berm between Cells #2 and #3, which could compromise the integrity of the berm.
- 7) The leachate collection drain was observed clogged with grit at the transfer station rendering it inoperable as cited on 12/23/99 report. In addition, on 11/9/99 RIDEM personnel observed a bulldozer operating outside the confines of the transfer station as well as solid waste being dumped outside the confines of the transfer station.
- 8) Dust problems were noted on-site during the inspections.
- 9) Compost windrows were observed on-site (on the top of cell #3). The compost operation has been continuing without a RIDEM registration for over (2) years.
- 10) The Power Screen Trommel was observed operating on the south side of Cell #2 in violation of the operating plan.
- 11) The width of the wood chip piles were observed exceeding the allowable maximum of 20 feet. Also, no separation distance existed between the piles and the adjacent building in violation of the regulations.

If you have any questions with the above-cited issues, Please do not hesitate to contact our Office at (401) 222-2797.

Sincerely,

Leo Hellested, P.E., Chief
Office of Waste Management

cc: Jan Reitsma, Director
Terrence Gray, Assistant Director
Dean Albro, Chief – OC&I